

Message

From: Gross, Louise C [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=25A8DF2A549B43FCAFB543F4388B170A-LGROSS02]
Sent: 6/7/2021 6:56:27 PM
To: Schaufelberger, Daniel [schaufelberger.daniel@epa.gov]
Subject: RE: List of Questions for New Water

Thanks.

Louise C. Gross
Associate Regional Counsel
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From: Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>
Sent: Monday, June 7, 2021 12:58 PM
To: Gross, Louise C <gross.louise@epa.gov>
Subject: RE: List of Questions for New Water

Looks good. The attached has just two small changes.

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From: Gross, Louise C <gross.louise@epa.gov>
Sent: Monday, June 07, 2021 12:02 PM
To: Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>
Subject: RE: List of Questions for New Water

The attached is basically your list, minus the highlighted verbiage; if you think that we can live without the items, that would be my recommendation.

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From: Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>
Sent: Thursday, June 3, 2021 2:14 PM
To: Gross, Louise C <gross.louise@epa.gov>
Subject: List of Questions for New Water

These questions relate to Exhibit A provided by GBMSD.

The highlighted sentences are those that I'm not sure we need to ask at this time.

- 1) During a call with GBMSD, it was stated that an alarm is triggered when the pressure drop across the GAC bed is 8.4" of water column (wc). Only the 11" wc trigger is shown on the GAC "Interlocks and Responses" table. Why isn't the 8.4" wc alarm shown in the table? What action is taken when the 8.4" wc alarm is triggered? Is the averaging time for the 8.4" wc trigger level based on a 12-hr block average like the 11" wc trigger or some other averaging time?
- 2) The discussion about washing the activated carbon in Exhibit A is too open-ended.
- 3) How were the in-bed temperature monitor alarm thresholds established? Is there an averaging time associated with the trigger temperatures (i.e., 1 hour average)? What is the averaging period?
- 4) Was the CO monitoring at the GAC (high differential CO concentration between GAC inlet and outlet and high CO at GAC inlet and/or outlet and high carbon bed temperatures) included as a result of the GAC heat excursion event? Or were these monitors in place before the event? The GAC CO monitoring is not included in the GBMSD's SSMP.
- 5) The root cause analysis letter stated that GBMSD was planning on optimizing SO₂ and PM removal to protect GAC performance and reduce the likelihood of needing to wash the carbon. What, if anything, was done to optimize SO₂ and PM removal? The letter stated that the optimizing was scheduled for March 2020.
- 6) The enhanced protection system interlocks (i.e., CO and temperature monitoring at the GAC) are not included in the SSMP. Why?
- 7) The GAC shutdown due to a low differential temperature (dT) between the scrubber outlet and the GAC inlet is set to < 15 F in the "GAC Parameter Interlocks and Responses" table. The EPA approved alternative monitoring plan provides that a minimum dT should be 45 F for a 12-hour block average (per manufacturer's recommendation). Is there an alarm for the 45 F dT? Is the 15 F trigger dT based on a 12-hour block average or some other averaging time? How was 15 F trigger dT established?
- 8) Could GBMSD indicate which GAC parameters were added to the "GAC Parameter Interlocks and Responses" table as a result of the temperature excursion event in the GAC? Also, describe how the trigger value was determined.

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